

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WALTER PICKETT, individually, and on
behalf of others similarly situated,

Plaintiff,

v.

SIMOS INSOURCING SOLUTIONS,
CORP., a Georgia corporation,

Defendant.

No. 17 Civ. 1013

Hon. Matthew F. Kennelly

**MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS,
APPOINTMENT OF PLAINTIFF'S COUNSEL AS CLASS COUNSEL, AND
APPROVAL OF PLAINTIFF'S PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Class, Appointment of Plaintiff's Counsel as Class Counsel, and Approval of Plaintiff's Proposed Notice of Settlement, and supporting declarations and exhibits, Plaintiff respectfully requests that the Court enter an Order:

- (1) granting preliminary approval of the settlement on the terms set forth in the Settlement Agreement;
- (2) conditionally certifying the proposed settlement class, for settlement purposes only, under Federal Rule of Civil Procedure 23(b)(3);
- (3) appointing O&G as Class Counsel;
- (4) approving the proposed Notice and Claim Form, and direct its distribution;
- (5) appointing JND Legal Administration as Settlement Administrator; and
- (6) scheduling a fairness hearing for final approval of the settlement.

Dated: March 10, 2017
New York, New York

Respectfully submitted,

/s/ Ossai Miazad

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Putative Settlement Class*